

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KIMBERLY BELTRAN,
Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

SOS LIMITED, YANDAI WANG,
and ERIC H. YAN,

Defendants.

Civil Action No. 1:21-cv-7454-RBK-
EAP

(Document Filed Electronically)

CLASS ACTION

Motion Day: November 29, 2022

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND AWARD TO PLAINTIFFS**

PLEASE TAKE NOTICE that pursuant to the Court’s Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 47), as modified by ECF Text Order on July 26, 2022 (ECF No. 48), on November 29, 2022 at 3:00 p.m., Lead Plaintiffs William Rodgers and Shawn Ho (“Plaintiffs”)¹ will move this Court, the Honorable Robert B. Kugler, United States District Judge of the United States District Court for the District of New Jersey, 4th & Cooper Streets, Courtroom 4D, Camden, New Jersey, for entry of an order granting an award of attorneys’ fees, reimbursement of expenses, and award to Plaintiffs.

In support of this motion, Plaintiffs rely on the accompanying Memorandum of Law, the Joint Declaration of Laurence Rosen and Reed R. Kathrein and exhibits attached thereto, all filed contemporaneously herewith, all pleadings, records, and papers on file herein, and such further argument and briefing as may be presented at or before the Settlement Hearing.

Dated: November 1, 2022

Respectfully submitted,

/s/ Laurence M. Rosen

Laurence M. Rosen

THE ROSEN LAW FIRM, PA

One Gateway Center

Suite 2600

Newark, NJ 07102

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation of Settlement dated May 20, 2022 (the “Stipulation”) (ECF No. 43).

Tel: (973) 313-1887
Fax: (973) 833-0399
lrosen@rosenlegal.com

Yu Shi (admitted *pro hac vice*)
The ROSEN LAW FIRM, P.A.
275 Madison Ave, 40th Floor
New York, NY 10016
Tel: (212) 686-1060
Fax: (212) 202-38277
yshi@rosenlegal.com

*Co-Lead Counsel for Co-Lead
Plaintiff William Rodgers and the
Class*

Reed R. Kathrein (admitted *pro hac
vice*)
**HAGENS BERMAN SOBOL
SHAPIRO LLP**
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Tel: (510) 725-3000
reed@hbsslaw.com

*Co-Lead Counsel for Co-Lead
Plaintiff Shawn Ho and the Class*

James E. Cecchi
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO,
P.C.**
5 Becker Farm Road
Roseland, NJ 07068
Tel: (973) 994-1700
Fax: (973) 994-1744
jcecchi@carellabyrne.com

*Liaison Counsel for Co-Lead
Plaintiffs and the Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen
Laurence M. Rosen